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Comments: March 18th, 2022

Dean Gould, Forest Supervisor

Judy Tapia, Forest NEPA Coordinator

1600 Toll House Road

Clovis, CA 93612

Re: Creek Fire Ecological Restoration Project Scoping Letter

Dear Mr. Gould,

Sierra Pacific Industries (SPI) is a third-generation, family-owned Forest Products Company, based in Anderson, California with 14 sawmill locations and actively managed timberlands throughout California, Oregon, and Washington. The Sonora Division is the southernmost part of the Company's operations, and includes the Standard and Chinese Camp facilities, directly employing 300 local workers and numerous contractors. In addition to investments to our community, SPI has made significant investments into our facilities over recent years, including rebuilding the Chinese Camp sawmill in 2007 and the Sonora sawmill in 2011.

SPI appreciates the opportunity to comment on the Creek Fire Ecological Restoration Project as described in your pre-NEPA scoping letter (dated March 3rd.) As requested, we are submitting this comment on the work proposed in this post-burn forest restoration project to provide input for the NEPA-planning process.

#### Needs for Proposal

As was made clear in your letter, the Creek Fire was a devastating and record-setting fire for the Sierra National Forest, destroying just under 400,000 acres with large portions burning with high intensity. Destructive on a myriad of levels, the Creek Fire affected conifer forest, aquatic and wildlife habitat, rangeland, livestock, soils, seed sources, recreation sites, and sensitive areas alike. While the scope of this damage is considerably large, the need for a focused, intentional, and efficient restoration and resiliency strategy is even larger. We applaud the Sierra NF for this proposal, as our national forests are invaluable for a multitude of reasons, including bolstering our local economies, supplying timber products market-wide, contributing to our country's ability to build and grow, and in the long-term, providing carbon sequestration.

That being said, we believe the Sierra NF is facing a critical decision as to how to move forward in these unprecedented times. The Forest Service is a critical supplier of the timber industry and local economies, and as has been demonstrated over the last decade, needs to evaluate their management tactics to ensure that they are not only being good stewards of our public lands, but are being responsible neighbors to private landowners. We believe the Creek Fire Restoration Project provides ample opportunity for new and functional management to be implemented, and will allow the Sierra NF to continue being a key participant in California's timber industry.

#### A Critical Timeframe

As is referenced multiple times throughout the scoping letter, the Sierra NF asserts that the next 5 to 7 years is a critical timeframe for post-fire rehabilitation; however, SPI would like to emphasize that that timeframe began in 2020, and by the time the NEPA process is complete, it will have been at close to two years since the Creek Fire ignited. Additionally, the utilization of merchantable forest products is referenced multiple times as a potential

source of funding for this restoration project, with a target timeframe of 3 years (with the ignition of the Creek Fire being in 2020, this would make the last year for mechanical harvesting 2023.) With operations on this project unlikely to begin before 2023, we would like to emphasize that there is an extremely low likelihood of having any notable merchantable timber volume able to be harvested from the Creek Fire burn. Merchantability standards show that viability can begin declining as soon as six months post-burn, and timber is typically only commercially viable up to two years at the most after a fire. According to our own statistics (based on timber sourced from the Doghouse Flat Timber Sale and other private sales in the surrounding area,) volume that we received that was burnt in the Creek Fire is averaging defect of anywhere from 10-15%. By the time the Sierra NF implements this plan and begins operations, a significant portion of the one billion board feet (p.19) burned in the Creek Fire will no longer be merchantable. As we get into the second year post-burn, the diameter limit of merchantable versus non-merchantable trees is going to steadily increase. Considering this, we would recommend that typical diameter limits set against cutting larger trees be abandoned in the interest of garnering as much merchantable value as possible from salvage efforts.

While there is little prospect of the Sierra NF receiving significant funding from merchantable timber sales within the Creek Fire footprint, we understand and support the need for hazard trees to be mitigated along the 925 miles of road systems as proposed, and recognize the likelihood of significant amounts of biomass removal. We would like to emphasize the need for biomass removal within any timber and service contracts be implemented by agreement to allow for any potential future industry opportunities.

Finally, we would like to stress that, because such a larger portion of standing burnt timber in the Creek Fire footprint is likely non-merchantable, the focus on implementing salvage timber sales be redirected to rehabilitating the 20,000 acres of green forest left within the burn area (p.25), as well as reforestation and treatment efforts.

#### Reforestation and Rehabilitation

As is touched on in the scoping letter, there is a serious possibility of large portions of the forest being subject to total land conversion if reforestation and management is not implemented in an effective way, essentially meaning that large swaths of previously scenic and functional pine and mixed conifer forest would now be brush fields. Additionally, allowing natural regeneration would mean that, for the next 40 years (p.23), dry logs would be decomposing on the forest floor, in addition to fast-growing invasive brush species repopulating, creating a tinderbox of fire fuels that would be simultaneously choking out any conifer regeneration. Considering that nearly 104,000 acres (54%) of yellow pine and mixed conifer areas have a 0-40% chance of natural regeneration (p.19), we believe that these areas, as appropriate, should be prioritized for replanting and active, intentional management. Natural regeneration and "passive management," as referenced in the scoping letter, should be the last option utilized by the Sierra NF, as passive management is what fostered a forest vulnerable to such a large-scale, devastating wildfire as the Creek Fire, and would likely create a scenario in which any re-burn of the Creek Fire footprint would sterilize the area and make any hope of regeneration unlikely. Because of the urgency and gravity of these circumstances, we urge the Sierra NF to implement large-scale hazard abatement, regardless of merchantability, and efficient forest management to ensure that optimal reforestation and rehabilitation occurs.

#### Conclusion

Sierra Pacific Industries greatly supports the efforts being made in the Creek Fire Restoration Project. We strongly emphasize the Sierra NF's role in both the local economy and the timber industry, and identify the dire need for rehabilitation after the Creek Fire. We support the proposed actions and recognize the importance of each for the overall restoration of the Sierra NF.

Sincerely,

Hannah Grabowski  
Sierra Pacific Industries  
Procurement Forester